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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA,**

**6:23-mc-184**

**Plaintiff,**

**v.**

**UNOPPOSED MOTION TO  
EXTEND 90-DAY PERIOD  
PURSUANT TO  
18 U.S.C. § 983(a)(3)(A)**

**\$49,494.00 U.S. CURRENCY;  
ASSORTED SILVER COINS; and 2019  
TOYOTA LANDCRUISER, VIN  
JTM CY7AJ6K4074296 WITH TOOLS  
AND APPURTENANCES, *in rem*,**

**Defendants.**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted John Kolego, attorney for claimant Kevin O'Donnell, who concurs with this extension.

On December 5, 2022, Kevin O'Donnell, filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to \$49,494.00 U.S. Currency; Assorted Silver Coins; and 2019 Toyota Landcruiser seized from Kevin O'Donnell, on or about September 15, 2022.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Kevin O'Donnell, agree to extend the time in which the United States will file a complaint for forfeiture against the \$49,494.00 U.S. Currency; Assorted Silver Coins; and 2019 Toyota Landcruiser or to obtain an indictment alleging that the assets are subject to forfeiture. Kevin O'Donnell, agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Monday, April 3, 2023.

Kevin O'Donnell, agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until April 3, 2023, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Kevin O'Donnell, shall not seek its return for any reason in any manner.

DATED: **February 28, 2023**

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

s/ Amy E. Potter  
**AMY E. POTTER**  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on February 28, 2023, to:

John Kolego

JohnKolego@yahoo.com

Attorney for claimant Kevin O'Donnell,

s/ Dawn Susuico

DAWN SUSUICO

Paralegal